

REMARKS

Claims 1-33 are pending in the application. Applicants have amended claims 1, 9, 12, and 24 to correct obvious typographical errors. Applicants have further amended claim 1 to clarify that the assigned network address is sent prior to establishing a secure link. Applicants have added claims 31-33.

Summary of the Office Action

The Office Action, mailed February 3, 2004, rejects claims 1-12, 14-19, and 21-30 as obvious over a combination of U.S. Patent No. 6,393,484 ("Massarani") in view of Kent et al., Security Architecture of Internet Protocol ("Kent"). Claims 13 and 20 are rejected as obvious over Massarani in view of Kent, and further in view of U.S. Patent No. 5,854,901 ("Cole"). The drawings are objected to as failing to comply with 37 C.F.R. 1.84(p)(4).

Discussion of the Objections to the Drawings

The drawings are objected to because both reference characters "204" and "304" are used to designate the DHCP server. Applicants respectfully submit that the drawings correctly identify the DHCP server with reference numeral "204." To address the objection, Applicants have amended the specification to provide uniform reference to the DHCP server with the reference numeral 204. Accordingly, it is submitted that no drawing amendments are required and Applicants request that the objection be withdrawn.

Discussion of the Rejections under 35 U.S.C. § 103

The Office Action rejects claims 1-30 over certain combinations of Massarani, Kent, and Cole. Applicants respectfully submit that the Office Action has not established a *prima facie* case of obviousness, because (1) the cited references do not teach all claim limitations, and (2) there is no motivation or suggestion to modify or combine the references as suggested in the Office Action. Accordingly, Applicants respectfully request that the rejections under § 103 be withdrawn.

Independent claims 1, 9, 12, and 21 each recite a client receiving or being sent an assigned network address having a lease period. Massarani discloses an authentication system that is based on a provisional user authenticated state and IP lease (Massarani, Abstract). However, it is submitted that the provisional user authenticated state and IP lease disclosed in Massarani are not the same as the assigned network address having a lease period as recited in the claims. To authenticate a client, Massarani discloses that a DHCP server marks the end user's device authentication and IP lease as provisional (Massarani, FIG. 4, Column 6, line 66, through Column 7, line 2). However, in Massarani, access to the IP address of the server is marked as provisional with a lease time (Massarani, Column 7, lines 2-9). In contrast, the claims recite that the assigned IP address of the client is marked with a lease period. Thus, in Massarani, the lease period is associated with the server's IP address, which is distinguishable from the patent claims wherein the lease period is associated with the client's IP address.

Moreover, Massarani discloses that the assigned IP address is not sent to the user until after the authentication of the user is completed (Massarani, FIG. 4). In particular, Massarani states that the selected IP address is to be returned to the requesting end user device (Massarani, FIG. 4, Column 6, lines 49-53) at step 422, which step is after the user device has been authenticated (Massarani, FIG. 4, Column 7, lines 31-37). In contrast, claim 1 recites that the assigned network address is sent to the client before the client has been authenticated, i.e. "prior to establishing a secure link."

Applicants further note that Massarani fails to disclose a wireless access point or a wireless client. The Office Action acknowledges this point but concludes that it would have been obvious "to adapt a wireless access point to provide access for a wireless client because it would have increased flexibility of Massarani's system by adding mobility to the client's terminals." Applicants respectfully submit that the stated rationale for modifying Massarani is a conclusory statement unsupported by a reference to the prior art or any other suitable evidence. Moreover, there is no motivation to modify Massarani as suggested by the Office Action. A wireless system is significantly different than a hard wired system because they both deal with drastically different issues and problems specifically in the area of network security. For example, it is relatively easy for a person

to "sniff" or monitor traffic on a wireless network to gain unauthorized access, whereas a hard wired system can provide more robust security.

Kent and Cole are relied upon in the Office Action for their teachings of providing a secure connection and broadcasting of an ARP packet, respectively. However, Kent and Cole likewise fail to disclose, teach, or suggest, a method for controlling access to a wireless access point by a wireless client, assigning a network address to a wireless client that has a lease period, and that the network address is sent to the client before the client has been authenticated. Accordingly, even when combined, Massarani, Kent, and Cole fail to teach the combination of limitations recited in independent claims 1, 9, 12, and 21.

Additionally, it is respectfully submitted that the Office Action has not established a suggestion or motivation to combine the teachings of Kent or Cole with Massarani. In the case of Kent, the Office Action concludes that it "would have been obvious to one of ordinary skill in the art at the time of applicant's invention to combine the teachings of Kent et al. within the system of Massarani because it would have increased security through a higher degree of authentication between the client and the access point." In the case of Cole, the Office Action concludes that it "would have been obvious to one of ordinary skill in the art at the time of applicant's invention to combine the teachings of Cole et al. within the combination Massarani and Kent et al. because it would have increased efficiency by eliminating the need of the DHCP server of Massarani's teachings to keep track of all IP addresses." Applicants again respectfully submit that the rationale for combining references is based upon a conclusory statement unsupported by a reference to the prior art or any other suitable evidence. In fact, none of the cited references are directed to controlling access by a wireless client and, therefore, there is no suggestion or motivation to combine the cited references to provide a way to establish a secure link with the wireless access point as recited in independent claims 1, 9, 12, and 21.

For all the above reasons, Applicants submit that the cited references do not, either when taken alone or in combination, disclose, teach, or suggest the features of:

- (1) "sending the assigned network address to the wireless client, wherein the network address has a lease period" and "sending the assigned network address to the wireless client prior to establishing a secure link" as recited in claim 1;
- (2) "the wireless client using an assigned network address having a lease period to communicate with the network" and "communicating with an address server of the network to determine whether the lease period of the leased network address has expired" as recited in claim 9,
- (3) "receiving an assignment of an address from the address server, the address having a lease time" and "relaying the assignment of the address to the wireless client" as recited in claim 12, and
- (4) "on a wireless client ... receiving an assignment of a leased address from the network, the leased address having a lease time" as recited in claim 21.

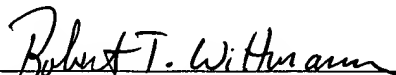
The remaining dependent claims 2-8, 10, 11, 13-20, and 22-30 depend from claims 1, 9, 12, and 21. These dependent claims are patentable for at least the same reasons as their respective base claims given the remarks and amendments above. However, Applicants reserve the right to present further arguments in the future with regard to these dependent claims in the event that the independent claims are deemed unpatentable. Accordingly, Applicants request that the rejections of dependent claims 2-8, 10, 11, 13-20, and 22-30 be reconsidered and withdrawn.

Applicants added new claims 31-33 and submit that no matter has been added. In particular, claim 31 is supported by step 318 of FIG. 5 and discussed on page 11, lines 11-12 of the specification. Page 11, lines 6-11 of the specification support the features of claim 32. Page 13, lines 17-20 of the specification support the features of claim 33. Accordingly, Applicants request the consideration of new claims 31-33.

CONCLUSION

The application is considered in good and proper form for allowance, and the Examiner is respectfully requested to pass this application to issue. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,



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